

The pending claims of the present application are directed towards embodiments of a bracket and mounting system for use with fiber optic cables. Specifically, the bracket of the present application allows for the proper alignment of fiber optic cables, which is crucial because of the need to align the cables with optical transmitting and receiving components. Improper alignment may result in degraded optical signals and potentially lost data. Additionally, the bracket of the present application prevents multiple fiber optic cables from becoming entangled with one another. Further, the bracket helps prevent breakage of the fiber optic cables when used in settings such as a laboratory.

For example, Claim 1 recites a bracket configured to organize a plurality of fiber optic cables. The bracket comprises a propping member having at least one aperture and at least one coupling member disposed in the at least one aperture. The coupling member is configured to selectively couple the end of a fiber optic cable. Additionally, Claim 1 recites a connector member connected to the propping member.

The Applicant respectfully submits that Claim 1 is not anticipated by the cited *Kuhn* reference in that *Kuhn* does not disclose each and every element of Claim 1. For example, *Kuhn* does not recite a coupling member configured to selectively couple to the end of a fiber optic cable as recited in Claim 1. Further, *Kuhn* fails to disclose a bracket that can be used to organize fiber optic cables.

Kuhn discloses a bracket for mounting pilot burners in relation to main burners. The Office Action relies on Figure 1 and the description thereof as allegedly disclosing the elements described above with regard to Claim 1. As recited in column 2, lines 27-29, Figure 1 illustrates a gas inlet connector 8 that may be coupled to a main burner 2. *Kuhn* does not suggest or teach that a gas inlet connector can be used to selectively couple to the end of a fiber optic cable. By

its very nature, a gas inlet valve is used for coupling gas supply means to a burner and not for coupling an end of a fiber optic cable as required by Claim 1. In fact, *Kuhn* teaches in column 2, lines 25-41 that gas inlet connector 8 is used to attach a main burner 2 to a gas supply means.

Additionally, the Office Action points out element 50 as part of the fiber optic coupling member. However, in Column 3, lines 45-52, *Kuhn* recites that element 50 is used to hold a pilot burner in place. As before, *Kuhn* does not teach or suggest that element 50 may couple to the end of a fiber optic cable. Therefore, *Kuhn* does not disclose at least one coupling member configured to selectively couple to the end of a fiber optic cable. Accordingly, because *Kuhn* does not disclose each and every element of claim 1, *Kuhn* does not anticipate claim 1.

Furthermore, *Kuhn* fails to disclose a bracket that can be used to organize fiber optic cables. As mentioned, the present application teaches that the bracket of the present invention is used to organize fiber optic cables and Claim 1 is directed towards that end. *Kuhn*, on the other hand, discloses a bracket for burners and no where teaches or suggests the use of the bracket for fiber optic cables. In Figure 1 cited by the Office Action, a main burner 2 and a pilot burner 30 are depicted. If fiber optic cables replaced the burners, there would be nothing to couple them to the bracket. The fiber optic cables would simply have to hang in the bracket apertures. The fiber optic cables would still be prone to entanglement and damage and would not be properly aligned.

Independent Claim 12 recites a mounting system configured to organize a plurality of fiber optic cables with elements similar to those discussed above with regard to Claim 1. Accordingly, Claim 12 is not anticipated by *Kuhn* for at least those reasons stated above with regard to Claim 1.

In addition, the Applicant respectfully submits that *Kuhn* fails to disclose each and every element of Claim 12. Claim 12 recites a mounting system comprising a base and a bracket

similar to the bracket of Claim 1 configured to be mounted to the base. The Office Action relies on Figure 1 and the description thereof as allegedly disclosing the elements described with regard to Claim 12. However, Figure 1 only discloses apertures 18 for securing the bracket to the base. In column 2, lines 64-66 cite that "in each corner of the rectangular portion holes 18 are provided for mounting a universal header plate to a frame (not shown)." Nowhere does *Kuhn* teach or describe that a base is part of the bracketing system described. *Kuhn* merely teaches that holes are available to be used to couple a bracket to a frame if desired. Therefore, *Kuhn* does not disclose a mounting system for organizing a plurality of fiber optic cables comprising a base and a bracket configured to be coupled to the base. Accordingly, because *Kuhn* does not disclose each and every element of claim 1 and for the reasons just provided, *Kuhn* does not anticipate claim 12.

Claims 2-4, 7, 9, 11, 13-16, 18, and 21 variously depend from claims 1 and 12; and are therefore, patentably distinguishable over the cited *Kuhn* reference for at least those reasons stated above with regards to claims 1 and 12.

For at least the foregoing reasons, the Applicant respectfully request that the rejection of claims 1-5, 7, 9, 11-16, 18, and 21 as allegedly being anticipated by the *Kuhn* reference be withdrawn.

Rejections under 35 U.S.C. § 103(a)

On pages 2 and 3 of the Office Action, claims 6, 8, 10, 17, 20, and 22 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatable over *Kuhn*. The Applicant respectfully traverses this ground of rejection.

Claims 6, 8, 10, 17, 20, and 22 variously depend from Claims 1 and 12. As discussed previously, *Kuhn* does not disclose a bracket configured to organize a plurality of fiber optic

cables comprising a propping member having at least one aperture and at least one coupling member disposed in the at least one aperture, the coupling member being configured to selectively couple to the end of a fiber optic cable. Accordingly, because *Kuhn* does not disclose or suggest each and every element of Claims 1 and 12, *Kuhn* does not render Claims 1 and 12 unpatentable. Accordingly, claims 6, 8, 10, 17, 20, and 22, which depend from Claims 1 and 12, are patentably distinguishable over the *Kuhn* reference for at least those reasons stated above with regard to Claims 1 and 12.

In addition, the cited reference must disclose prior art analogous to the present application. M.P.E.P § 2141.01(a) states that "in order to rely on a reference as a basis for rejection of an applicant's invention, the reference must either be in the field of the applicant's endeavor or, if not, then be reasonably pertinent to the particular problem with which the invention was concerned." The Applicant respectfully submits that pilot burners are not in the same field of endeavor as fiber optic cables. Further, *Kuhn* is not pertinent to the problem with which the present application is concerned. *Kuhn* teaches a bracket for mounting a pilot burner in relation to a main burner. The Applicant respectfully contends this is not pertinent to the problem of organizing fiber optic cables to prevent entanglement and breakage and to ensure proper alignment of the fiber optic cables. As such, the *Kuhn* reference may not be used as a reference for a 35 U.S.C. § 103(a) rejection.

For at least those reasons stated above, The Applicant respectfully request that the rejection of claims 6, 8, 10, 17, 20, and 22 as allegedly being unpatentable in view of the *Kuhn* reference be withdrawn.

In view of the foregoing, the Applicant respectfully submits that the present application is in condition for allowance, and requests the Examiner issue a notice to the effect. In the event

that the Examiner finds remaining impediment to a prompt allowance of this application that may be clarified through a telephone interview, the Examiner is requested to contact the undersigned attorney at (801) 533-9800.

Dated this 6th day of December, 2004.

Respectfully submitted,



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